

## Conshelf Services

8 November 2021

Ms. Liane Randolph, Chair  
c/o Harborcraft  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

RE: CARB's Proposed Revisions to the Commercial Harbor Craft Regulations

Dear Madam Chair,

Conshelf Services (Costa Mesa, CA) is a certified small business that owns three commercial harbor craft with diesel engines. These vessels are used by MBC Aquatic Sciences, a certified small business specializing in marine and freshwater studies primarily in California. MBC currently has 23 employees.

Conshelf's vessels are used primarily to collect field data on: bathymetry, water and sediment quality, benthic communities, and kelp beds. These studies are performed to comply with various environmental permits (Waste Discharge Requirements, Clean Water Act §401, California Coastal Development Permits, Army Corps §404, etc.). All three vessels are transported on trailers, which minimizes the travel time on the water and engine hours. Each vessel is unique, and used for specific tasks, but all are 23 to 26 ft in length, and powered by diesel engines.

- Requirements to repower our vessels are excessive for a small business such as ours. The cost to repower one of our vessels would be equivalent to ~20-30% of our annual revenue. The proposed Low Use provisions are vital to small companies.
- Consider ongoing supply chain delays. The time to order and receive engines and engine parts right now is much longer than it was a few years ago, or even compared to last month. The proposed compliance dates are not likely attainable.

Date	Parameter	Port of Los Angeles	Port of Long Beach
<b>10/11/21</b>	Vessels at Anchor	28	33
<b>11/5/21</b>		33	35
<b>10/11/21</b>	Average Anchor Time	10 days	13 days
<b>11/5/21</b>		15 days	14 days
<b>10/11/21</b>	Maximum Anchor Time	23 days	35 days
<b>11/5/21</b>		Not available	41 days

- Consider incentive funding for small businesses to offset economic impacts.

*Conshelf Services*

I appreciate your time and consideration.

Respectfully,

**Conshelf Services**

A handwritten signature in blue ink that reads "Shane Beck". The signature is written in a cursive style with a blue highlight behind it.

Shane Beck  
President